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July 1, 2021

By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York and I am among counsel for the defense in the above-referenced matter. I write to respectfully request a brief extension to Tuesday, July 6, 2021 to fully respond to Plaintiffs' Interrogatory No. 11. Counsel for plaintiffs consent to this request.

During the June 24th conference in this matter, Your Honor Ordered the defendants to provide a response to Interrogatory 11 by today, July 1, 2021. Interrogatory 11 states "Identify any and all personnel of the Office of the Mayor or the Mayor's Office of Criminal Justice present at any of the Protests listed on the attached Schedule A."

After consultation with employees at the Mayor's Office and the Mayor's Office of Criminal Justice (MOCJ), we were able to confirm that one employee of MOCJ was present at a protest or protests, and 20 employees of the Mayor's Office were present at a protest or protests. Although we know that no additional MOCJ employees were present, due to the fact that certain individuals at the Mayor's office are currently on vacation or no longer employed at the Mayor's office, the defendants will need until early next week to confirm that no additional employees were present. Rather than give potentially incomplete information, this short extension will permit an accurate response. Defendants will provide the names of the 21 confirmed individuals tonight, and provide the names of any additional individuals on July 6, or confirm that there were no additional employees present.

Thank you for your consideration herein.

Respectfully submitted,

Dara L. Weiss s/

Dara L. Weiss

Senior Counsel

Special Federal Litigation Division

cc: All Counsel *via ECF*